

EXHIBIT B

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Attorneys for Plaintiff LHF Productions, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LHF PRODUCTIONS, INC., a Nevada
Corporation,

Plaintiff,

vs.

MARIA GONZALEZ, an individual;
BRIAN KABALA, an individual; JOHN
KOEHLI, an individual; DANIEL
O'CONNELL, an individual; DONALD
PLAIN, an individual; ANTE SODA, an
individual; MATTHEW STEWART, an
individual; and JOHN AND JANE DOES.

Defendants

BRIAN KABALA, an individual;

Counter-Plaintiff,

vs.

LHF PRODUCTIONS, INC., a Nevada
Corporation,

Counter-Defendant,

Case No.: 2:16-cv-02028-JAD-NJK

**LHF'S AMENDED FRCP 26(a)
DISCLOSURES**

LHF'S INITIAL DISCLOSURES

Without waiving any work product protection or other privilege, in good faith Counter-Defendant LHF PRODUCTIONS, INC. ("Counter-Defendant" or "LHF") by and through its undersigned counsel, hereby discloses the following items pursuant to Rule 26(a) of the Federal Rules of Civil Procedure. LHF reserves the right to supplement these disclosures and agrees to do so in good faith as may be proper.

- (i) **the name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

1. JONATHAN YUNGER

Jonathan Yunger is the Co-President for Millennium Media, Inc., the primary production company associated with LHF and represented by undersigned counsel. Mr. Yunger is a witness with respect to the management and licensing of LHF and is knowledgeable with respect to both LHF and the motion picture industry in general. Mr. Yunger has information on the development of the motion picture, including costs, production, distribution, the general nature of LHF's businesses, general information regarding LHF's anti-piracy efforts and the injuries LHF suffers due to piracy.

Address: 6423 Wilshire Blvd.
Los Angeles, California 90048
Tel: (310) 388-6900

2. DANIEL ARHEIDT

Daniel Arheidt is a German Citizen, represented by his own counsel. Daniel Arheidt is a consultant to LHF's primary investigator, Maverickeye UG, and is a custodian of the records associated with the direct peer-to-peer connection with Counter-Plaintiff's IP address and is knowledgeable about associated activity, and records. Mr. Arheidt has information related to the data collected and related to Counter-Plaintiff's IP address and the infringing torrent / file.

Address: c/o Maverickeye UG
Heilbronner Strasse 150
70191 Stuttgart, Germany
Tel: +49 (0)711-49004127

3. BENJAMIN PERINO

Benjamin Perino is a German Citizen, represented by his own counsel. Benjamin Perino is a developer of the software used by LHF's investigator MaverickEye UG, is knowledgeable

1 about the software used by the investigator and has knowledge about peer-to-peer file exchanges
 2 and the veracity of the investigation in this case. Benjamin Perino may provide expert testimony
 3 related to the investigation, the data collected from Counter-Plaintiff's IP address, means of
 4 collection, and interpretation of the data.

5 Address: Maverickeye UG
 6 Heilbronner Strasse 150
 7 70191 Stuttgart, Germany
 8 Tel: +49 (0)711-49004127

9 **4. ROBERT D. YOUNG**

10 Mr. Robert D. Young is of Ability Systems Corporation, Aloha, Oregon. Robert D. Young
 11 is an expert who has reviewed internet technology, ISP operations, home computer networks,
 12 remote data tracking techniques, and investigation related matters, including the source code of
 13 the MaverickEye technology. Robert D. Young may provide fact and expert testimony related to
 14 MEU's investigation, the data collected from Counter-Plaintiff's IP address, means of collection,
 15 and interpret the data.

16 Address: PO Box 6593
 17 Aloha, OR 97007
 18 Tel: 503-259-2614.

19 **5. STEPHEN BUNTING**

20 Mr. Stephen Bunting is of Bunting Digital Forensics, LLC, located at Lewes, DE. Stephen
 21 Bunting is US based computer forensic expert who recently tested MaverickEye's infringement
 22 detection system which it used to monitor and record evidence of Mr. Kabala's infringement. Mr.
 23 Bunting is a well-respect expert who has worked in law enforcement for over three decades, and
 24 has expertise in peer-2-peer and BitTorrent technology. He has also conducted hundreds of
 25 computer examinations for federal, state, and local law enforcement and prosecutorial agencies.
 26 He provides training and course development for the U.S Department of State's Anti-Terrorism
 27 Assistance Program Cyber Division. Mr. Bunting's recent test of MaverickEye's infringement
 28 detection system resulted in his conclusion that the system accurately records an IP address's

1 infringing transactions through the BitTorrent network. Mr. Bunting may provide expert
2 testimony related to MaverickEye's infringement detection system, the data collected from
3 Counter-Plaintiff's IP address, means of collection, and interpretation of the data.

4 Address: Bunting Digital Forensics, LLC
5 33579 Blue Heron Drive
6 Lewes, DE 19958
7 Tel: +1.302.260.2633

8 **6. COX COMMUNICATIONS, INC.**

9 Cox Communications, Inc. is the ISP used by Counter-Plaintiff and has relevant
10 information related to his IP address and Internet usage.

11 Address: Cox Communications, Inc.
12 Attn: Custodian of Records
13 6205-B Peachtree Dunwoody Road, 16th Floor, Atlanta, GA 30328
14 Tel: 404-269-5713

15 **7. OTHER PARTIES**

16 It is anticipated that other parties may have relevant information such as Google, which is
17 likely to have a notable search history indexed to Mr. Kabala's IP address, together with other
18 occupants of Mr. Kabala's residence, if any, and other parties who may be witnesses disclosed
19 throughout the discovery process.

20 It is also anticipated that one or more other third-party piracy monitoring services, such as
21 those that provided DMCA notices will have additional records related to the infringing conduct
22 which is the subject of this action, including parties such as Excipio, Rightscorp, and
23 MarkMonitor.

24 Plaintiff intends to amend these disclosures as may be proper as discovery proceeds.

25 **(ii) a copy — or a description by category and location — of all documents,**
26 **electronically stored information, and tangible things that the disclosing party**
27 **has in its possession, custody, or control and may use to support its claims or**
28 **defenses, unless the use would be solely for impeachment;**

1 The infringement detection system may be personally inspected and reviewed by Counter-
2 Plaintiff and/or his designated experts. LHF agrees to cooperate in facilitating such review.

3 LHF's investigators are in possession of an infringement capture log (Bates LHF000146,
4 LHF000147, and LHF000153) and an event log (Bates LHF000148-149, LHF000152, and
5 LHF000157-158) each of which illustrates the infringing transactions at issue in this case. These
6 logs are available to Counter-Plaintiff. Such data is located in Karlsruhe, Germany or in the virtual
7 "cloud" and may be produced directly to Counter-Plaintiff by email on request pursuant to FRCP
8 34.

9 LHF's investigators are also in possession of additional data of observed BitTorrent
10 activity ("Additional Evidence") (Bates LHF000144-145, LHF000155, and LHF000159) that will
11 be produced at cost from Maverickeye.

12 LHF also identifies the relevant copyright certificate and associated licensing and
13 assignment materials and publicly available registration records.

14 LHF is also in possession of documents and evidence related to the impact and harm
15 suffered by LHF and the industry due to piracy.

16 Materials, unless identified otherwise, are in LHF's offices in Los Angeles, California, or
17 digital and in the virtual "cloud."

18 **(iii) a computation of each category of damages claimed by the disclosing party —**
19 **who must also make available for inspection and copying as under Rule 34 the**
20 **documents or other evidentiary material, unless privileged or protected from**
21 **disclosure, on which each computation is based, including materials bearing on**
22 **the nature and extent of injuries suffered.**

23 LHF will be seeking its reasonable attorney fees and costs in defending this case.

24 **(iv) for inspection and copying as under Rule 34, any insurance agreement under**
25 **which an insurance business may be liable to satisfy all or part of a possible**
26 **judgment in the action or to indemnify or reimburse for payments made to satisfy**
27 **the judgment.**

28 Counter-Defendant is not aware of any relevant insurance policies.

1 DATED this 29th day of June 2018.

2 *Respectfully submitted,*

3 **WEIDE & MILLER, LTD.,**

4 */s/ F. Christopher Austin*

5 F. Christopher Austin (NV Bar No. 6559)

6 caustin@weidemiller.com

7 **WEIDE & MILLER, LTD.**

8 10655 Park Run Drive, Suite 100

9 Las Vegas, NV 89144

10 Tel: 702-382-4804

11 Fax: 702-382-4805

12 *Attorneys for Plaintiff/Counter-Defendant*

13 LHF PRODUCTIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of WEIDE & MILLER, LTD. and that on June 29, 2018, I served a full, true and correct copy of the foregoing **LHF'S AMENDED FRCP 26(a) DISCLOSURES** via the United States District Court's CM/ECF filing system upon the following:

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Eric Walther, Esq.
Kolesar & Leatham
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345 No. Canal Street, Suite C202
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lclayaal@gmail.com

/s/ Brianna Show

An employee of WEIDE & MILLER, LTD.